REMARKS

Claims 1-57 remain pending in the application.

The Applicants respectfully request that the Examiner reconsider earlier rejections in light of the following remarks. No new issues are raised nor is further search required as a result of the changes made herein. Entry of the Amendment is respectfully requested.

Claims 1-57 over Hawkins in view of Robertson and Smith

In the Office Action, claims 1-57 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over U.S. Patent No. 6,000,000 to Hawkins et al. ("Hawkins") in view of U.S. Patent Application Publication No. 2001/0047441 to Robertson, further in view of *The Multi-Boot configuration Handbook*, published March 29, 2000 to Smith ("Smith"). The Applicants respectfully traverse the rejection.

Claims 1-11 and 19-40 recite selecting a first database and a second database on a first graphical user interface and programming a conduit with a map file. Claims 12-18 recite configuring a conduit with a graphical user interface to synchronize a first database and a second database. Claims 41-45 recite a configurable conduit programmed with a graphical user interface to synchronize each database of a plurality of databases according to a respective mapping file of a plurality of mapping files. Claims 46-57 recite a method and system to select a first database and a second database on a graphical user interface and to generate a conduit based on the selected first database and second database.

The Examiner alleged that Hawkins discloses "a methodology and apparatus for transferring and synchronizing content between handheld devices and a personal computer, which includes communication link monitor, sync manager, process and reconcile the conduit databases." (see Response to Arguments section of the Office Action at page 18). The Examiner acknowledged that Hawkins' conduit database stores a list of conduit programs that may be executed, registering a first conduit program by placing an identifier for the first conduit program in the conduit program database, the first conduit

program comprising a computer program on a second computer system for performing a specific data transfer task, successively executing a set of conduit programs identified within a conduit program database from a manager program, each of the conduit programs accessing a library of functions for communicating with a first computer system (see Response to Arguments section of the Office Action at page 20). The Examiner alleges that all of this is evidence of the process of Hawkins' teaching of **HOW** the synchronization program that selects two databases is created (see Response to Arguments section of the Office Action at page 20). The Applicants respectfully disagree.

Hawkins' conduit database stores a list of conduit programs that may be executed. Thus, any disclosure of how the database is created is irrelevant to now the synchronization programs, i.e., the conduits within the database, are **CREATED**. Moreover, registering a first conduit program by placing an identifier for the first conduit program in the conduit program database, the first conduit program comprising a computer program on a second computer system for performing a specific data transfer task, and successively executing a set of conduit programs identified within a conduit program database from a manager program, each of the conduit programs accessing a library of functions for communicating with a first computer system simply describes how the conduits are **BEING USED**, not **HOW** they are **CREATED** in the first place. Hawkins' references conduits throughout the specification, but fails to disclose **HOW** those conduits are **CREATED**. Thus, the Examiner cannot assume anything from the reference other than the conduits that Hawkins' references are conventionally created, i.e., through a conventional programming language **NOT** through any type of GUI interface.

The Examiner emphasized Hawkins' Fig. 4. However, Hawkins' Fig. 4 simply discloses "a block diagram of the architecture of the synchronization system of the present invention" (see col. 3, lines 43-44). Thus, Hawkins' Fig. 4 simply discloses the **hardware** necessary to allow synchronization between a handheld computer 110 and a personal computer 150. Hawkins' Fig. 4 that

details <u>hardware</u> that **USES** conduits lacks <u>ANY</u> details of <u>HOW</u> a conduit is **CREATED**.

The Examiner alleged that Hawkins' disclosure at col. 3, line 50 through col. 4, line 50 is an extendible method and apparatus for synchronizing multiple files on two different computer systems that includes a personal computer system (110), a handheld computer system (150) and a display representing a computer system calendar program 115), wherein a graphical user interface would have been an obvious variant of a personal computer system (150) and a display representing computer system calendar program 115) and a mouse to a person of ordinary skill in the art at the time of the invention was made (see Office Action, page 21). The Applicants respectfully disagree.

Hawkins appears to disclose a graphical calendar program on a handheld computer 110 and a graphical calendar program on a personal computer 150. However, those graphical calendar programs are high level applications that rely on a conduit for their synchronization. However, Hawkins' invention is unconcerned with **HOW** a conduit is **CREATED**. For instance, Hawkins' invention fails to disclose or how the keys on the keyboard of the computer 150 are CREATED. With the Examiner's reasoning, the Examiner would allege that Hawkins' graphical calendar program suggesting using a graphical interface for a program to design a keyboard. Thus, simply because Hawkins discloses some type of graphical interface (specifically for a calendar program), surely the Examiner cannot be suggesting that Hawkins suggests application of a graphical interface to everything that is associated with that computer. Hawkins fails to disclose or suggest **HOW** a conduit is **CREATED**, much less in the manner claimed, as recited by claims 1-57.

The Examiner stresses that Robertson at paragraph 58 and Figs. 6 and 7 shows a sample user menu screen which prompts a user to choose the appropriate peripheral device 12 for data communications, with the user able to choose a number of options such as a PDA, a laptop, a multimedia device, an MPEG/MPG device, a camera or a video (see Response to Arguments section of

the Office Action at page 21). The Examiner alleged that Robertson disclosure of prompts to choose the appropriate peripheral device for data communications menu screen would have been obvious variant of GUI for selecting to a person of ordinary skill in the art at the time of the invention was made (see Response to Arguments section of the Office Action at page 21). The Applicants respectfully disagree.

Roberton's paragraph 58 and Figs. 6 and 7 discloses a graphical system that allows a user to control operation of interface module 20, data conversion module 22 and access ports A to G. Robertson at paragraph 58 and Figs. 6 and 7 at best discloses a GUI to **SELECT** a conduit. However, as previously argued nothing within Robertson suggests **HOW** to **CREATE** a conduit. As discussed above with Hawkins, simply because Robertson discloses some type of graphical interface (specifically for a configuring transfer of data between various types of devices), surely the Examiner cannot be suggesting that Robertson suggests application of a graphical interface to everything that is associated with that computer. Robertson fails to disclose or suggest **HOW** a conduit is **CREATED**, much less in the manner claimed, as recited by claims 1-57.

The Examiner argues that Hawkins and Robertson "provides a GUI so users can select a first database and a second database to synchronize database" (see Response to Arguments section of the Office Action at page 21). However, Hawkins' and Robertson's GUIs are high level programs that a user uses to simplify selection of which databases to synchronize, i.e., simplify selection of a conduit. The actual synchronization is performed by a program called a conduit. Niether Hawkins nor Robertson are concerned with **HOW** that conduit program is **CREATED**, much less suggest use of a GUI to **CREATE** a conduit, as recited by claims 1-57. Thus, the Examiner has **STILL** failed to show how this a prior art that uses a GUI to **SELECT** a conduit suggests use of a GUI to **CREATE** a conduit, as recited by claims 1-57.

The Examiner alleged that Smith is relied on to disclose "said conduit provides synchronization rules from said map file for said first database

and said second database" (see Response to Arguments section of the Office Action at page 21). However, as previously pointed out to the Examiner Smith cannot disclose "said conduit" or "said map file" if Smith fails to even mention use of a conduit or a map file. Smith fails to mention a conduit, a map file and synchronization of two databases, much less disclose HOW a conduit is **CREATED**, much less disclose use of a graphical user interface as a basis to create a conduit, as recited by claims 1-57. Smith has no real relevance to using a conduit, much less relevance to the **CREATION** of a conduit which the Examiner has failed to address much less refute.

The Examiner alleged that the motivation to modify Hawkins with the disclosure of Robertson is "because they are from the same field of endeavor of GUI for uses with File Transfer Protocol (FTP) for Cross-Platform data Exchange and for transferring and synchronizing content between handheld devices and a personal computer, which includes communication link monitor, sync manager, process and reconcile the conduit databases, and provides user the ability to synchronize a communications system conduit for matching the data between different API (Application Interface) that associated with different databases using single synchronization command (as taught by Hawkins at col. 1 line 30 through col. 2, line 61)" (see Response to Arguments section of the Office Action at pages 24-25). However, the Examiner's motivation to modify Hawkins with the disclosure of Robertson fails to even mention **CREATION** of a conduit, much less the obviousness of using a GUI to **CREATE** conduit, as recited by claims 1-57.

Moreover, the Examiner's motivation to modify Hawkins with the disclosure Robertson fails to provide motivation why one skilled in the art would be motivated to take Hawkins that the Examiner acknowledged is related to the **USE** of a conduit NOT to its **CREATION** with Robertson that the Examiner acknowledged is related to the **USE** of a conduit NOT to its **CREATION** would somehow result in a system and method of **CREATING** a conduit, much less result in use of a GUI to **CREATE** conduit, as recited by claims 1-57.

Moreover, the Examiner has failed to refute the fact that Hawkins' invention was created at a time when graphical user interfaces existed for other purposes, however Hawkins' nor any of the other cited prior art discloses or suggests use of a graphical user interface to assist in the creation of a conduit, much less disclose or suggest the Applicants' recited features.

Moreover, the Examiner failed to refute that Hawkins' invention is directed toward a one button synchronization between a handheld computer, i.e., a PDA and a personal computer system. Modification of Hawkins' to use a graphical user interface to select databases for synchronization as a basis for creating a conduit is **nonsensical** since Hawkins' invention is UNCONCERNED with HOW a conduit is CREATED.

Moreover, claims 1-11 and 19-40 recite a system and method of mapping at least one field of a first database to a corresponding field of a second database in a map file.

The Examiner acknowledged that Hawkins fails to disclose executing a conduit with a map file in response to a synchronization request (See Office Action, page 5). The reason Hawkins fails to disclose executing a conduit with a map file in response to a synchronization request is that Hawkins fails to disclose or suggest use of a map file for any reason, much less for executing a conduit with a map file in response to a synchronization request. Thus, the Examiner proposed that it is obvious to modify Hawkins to use a graphical user interface for select databases for synchronization **AND** to use a map file, which is unsupported by any suggestion within the cited prior art.

The Examiner alleges that the recited map file would have been an obvious variation of a sync registry that contains a list of conduit libraries that are used to synchronize (See Office Action, page 5). However, the Examiner has STILL failed to provide a REASON WHY the recited map file is an obvious variation of Hawkins' sync registry since the two are used for completely different reasons.

As the Examiner acknowledged, Hawkins' sync registry contains a list of conduit libraries. The recited map file is recited as mapping fields between

databases. The Examiner has <u>STILL NOT</u> addressed the entire limitation of the recited <u>map file</u>. Thus, the Examiner failed to refute that Hawkins's sync registry that contains a list of conduit libraries is <u>NOT</u> a map file that <u>maps fields between databases</u>, as recited by claims 1-11 and 19-40.
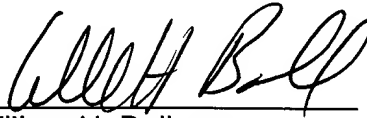
A benefit of a graphical user interface to select databases as a basis to program a conduit is, e.g., a major improvement over conventional use of a programming language to manually hardcode each and every step to perform such steps. Applicants' claimed features <u>GREATLY</u> simplify the <u>CREATION</u> of a conduit to synchronize a first and second database through use of a graphical user interface, e.g., eliminates a programmer having to hardcode each and every line of code need to create a conduit to synchronize a first and second database.

Accordingly, for at least all the above reasons, claims 1-57 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

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